# **斯丁名泰罗尔西奥马**

### Virginia State Corporation Commission eFiling CASE Document Cover Sheet

Case Number (if already assigned) PUR-2017-00060

Case Name (if known) Application of Virginia Electric and Power Company for

Approval of 100 Percent Renewable Energy Tariffs pursuant to §§ 56-577 A 5 and 56-234 of the Code of

Virginia

Document Type REEX

**Document Description Summary** Comments to the Hearing Examiner's Report by

Wal-Mart Stores East, LP and Sam's East, Inc.

Total Number of Pages 3

Submission ID 14215

**eFiling Date Stamp** 3/23/2018 5:05:35PM

## 医过程会的现在分词

#### Virginia State Corporation Commission eFiling CASE Document Cover Sheet

Case Number (if already assigned) PUR-2017-00060

Case Name (if known) Application of Virginia Electric and Power Company for

Approval of 100 Percent Renewable Energy Tariffs pursuant to §§ 56-577 A 5 and 56-234 of the Code of

Virginia

Document Type REEX

**Document Description Summary** Comments to the Hearing Examiner's Report by

Wal-Mart Stores East, LP and Sam's East, Inc.

Total Number of Pages

Submission ID 14215

**eFiling Date Stamp** 3/23/2018 5:05:35PM

3



Carrie M. Harris Direct Dial: (336) 631-1051 charris@spilmanlaw.com

March 23, 2018

Hon. Joel H. Peck, Clerk State Corporation Commission c/o Document Control Center Tyler Building, First Floor 1300 East Main Street Richmond, VA 23219

Re: Case No. PUR-2017-00060

Application of Virginia Electric Power Company, For approval of 100 percent renewable energy tariffs pursuant to §§ 56-577 A 5 and 56-234 of

the Virginia Code

Dear Mr. Peck:

Pursuant to the Hearing Examiner's March 2, 2018, Report and Recommendation, Wal-Mart Stores East, LP and Sam's East, Inc. ("Walmart") provides the following Comments to the Hearing Examiner's Report. Walmart supports the Hearing Examiner's recommendation that Virginia Electric and Power Company's ("Dominion or the Company") request for approval of six voluntary renewable energy tariffs (the "CRG Rate Schedules") be denied because (1) the Company failed to prove that the CRG Rate Schedules qualify as tariffs for "electric energy provided 100% from renewable energy" as required by § 56-577 A 5 of the Code of Virginia; and (2) Dominion did not prove that the CRG Rate Schedules as proposed were just and reasonable. Walmart further agrees with the Hearing Examiner that, if the CRG Rate Schedules are approved, they should be approved solely as experimental rates under § 56-234 B of the Virginia Code.

Copies of these Comments are being served on the parties as set forth in the attached Certificate of Service. Should you have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

Carrie M. Harris (VA Bar No. 76817)

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Comments to the Hearing

Examiner's Report by Wal-Mart Stores East, LP and Sam's East, Inc. upon the following

parties to this proceeding via electronic and U.S. First Class Mail.

Alisson Klaiber, Esquire Ashley Macko, Esquire State Corporation Commission Office of General Counsel P.O. Box 1197 Richmond, Virginia 23218-1197 Alisson.klaiber@scc.virginia.gov Ashley.macko@scc.virginia.gov

Lisa S. Booth, Esquire Dominion Resources Services, Inc. 120 Tredegar Street Richmond, VA 23219 lisa.s.booth@dom.com

AND

Joseph K. Reid, III, Esquire Elaine S. Ryan, Esquire Anne Hampton Andrews, Esquire McGuire Woods LLP Gateway Plaza 800 East Canal Street Richmond, VA 23219-3916 jreid@mcguirewoods.com eryan@mcguirewoods.com aandrews@mcguirewoods.com Counsel for Virginia Electric and Power Company

Patrick A. Toulme, Esquire Northern Virginia Electric Cooperative 10323 Lomond Drive Manassas, VA 20109 PTouleme@NOVEC.com Counsel for Northern Virginia Electric Cooperative

C. Meade Browder, Jr., Esquire Office of the Attorney General Division of Consumer Counsel 202 N. Ninth Street Richmond, VA 23219 mbrowder@oag.state.va.us

Michael J. Quinan, Esquire Cliona Mary Robb, Esquire Christian & Barton, LLP 900 E. Main Street, Suite 1200 Richmond, VA 23219 mquinan@cblaw.com crobb@cblaw.com Counsel for Direct Energy Services, LLC

Noelle J. Coates, Esquire American Electric Power Service Corporation 1051 East Cary Street **Suite 1100** Richmond, VA 23219 nicoates@aep.com AND James R. Bacha, Esquire American Electric Power Service Corporation 1 Riverside Plaza 29th Floor Columbus, OH 43215 jrbacha@aep.com Counsel for Appalachian Power Company Certificate of Service PUR-2017-00060 Page 2

William Cleveland, Esquire
Hannah C. Coman, Esquire
Southern Environmental Law Center
201 West Main Street, Suite 14
Charlottesville, VA 22902-5065
wcleveland@selcva.org
hcoman@selcva.org
Counsel for Environmental Respondents

Eric J. Wallace, Esquire GreeneHurlocker, PLC 1807 Libbie Avenue, Suite 102 Richmond, VA 23226 ewallace@greenehurlocker.com Counsel for Secure Futures, LLC

Brian R. Greene, Esquire
Eric W. Hurlocker, Esquire
William T. Reisinger, Esquire
GreeneHurlocker, PLC
1807 Libbie Avenue, Suite 102
Richmond, VA 23226
bgreene@greenehurlocker.com
ehurlocker@greenehurlocker.com
wreisinger@greenehurlocker.com
Counsel for Advanced Energy Economy,
Inc.

Cliona Mary Robb, Esquire
James G. Ritter, Esquire
Christian & Barton, LLP
909 East Main Street, Suite 1200
Richmond, VA 23219-3095
crobb@cblaw.com
jritter@cblaw.com
Counsel for National Energy Marketers
Association

Bruce H. Burcat, Esquire Mid-Atlantic Renewable Energy Coalition 29 N. State Street, Suite 300 Dover, DE 19901 bburcat@marec.us AND Robert F. Riley, Esquire Williams Mullen 1666 K Street NW, Suite 1200 Washington, DC 20006 rriley@williamsmullen.com AND Robert D. Perrow, Esquire Williams Mullen 200 South 10th Street, Suite 1600 Richmond, VA 23219 bperrow@williamsmullen.com Counsel for Mid-Atlantic Renewable Energy Coalition

Edward L. Petrini, Esquire
Cliona Mary Robb, Esquire
James G. Ritter, Esquire
Christian & Barton, LLP
909 East Main Street, Suite 1200
Richmond, VA 23219-3095
epetrini@cblaw.com
crobb@cblaw.com
jritter@cblaw.com
Counsel for Collegiate Clean Energy, LLC

Carrie M. Harris

Dated: March 23, 2018